At Albuquerque NM

IN THE UNITED STATES DISTRICT COURT

FEB 25 2015 wl

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN CLERK

UNITED STATES OF AMERICA,)	
Plaintiff,)	CRIMINAL NO. 14-3609 J.B.
vs.)	Counts $1 - 2$: 18 U.S.C. § 2423(b):
)	Travel to Engage in Illicit Sexual
BENTLEY A. STREETT,)	Conduct;
)	
Defendant.)	Counts $3 - 6$: 18 U.S.C. §§ 2251(a), (e),
)	and 2256: Attempted Production of a
)	Visual Depiction of a Minor Engaging
)	in Sexually Explicit Conduct;
	Ś	,
	Ś	Counts 7 – 9: 18 U.S.C. § 1470:
	í	Transfer of Obscene Material to
	Ś	Minors.
	,	

SUPERSEDING INDICTMENT

The Grand Jury charges that:

Count 1

From on or about July 11, 2013, and continuing to on or about July 13, 2013, both dates being inclusive, the defendant, **BENTLEY A. STREETT**, did travel in interstate commerce from Albuquerque, New Mexico, Bernalillo County, District of New Mexico, to Sycamore, Illinois for the purpose of engaging in any illicit sexual conduct with another person, namely, a sexual act (as defined in Title 18, United States Code, Section 2246) with JANE DOE 1, a person under 18 years of age that would be in violation of Chapter 109A of Title 18, United States Code, had the sexual act occurred in the special maritime and territorial jurisdiction of the United States.

In violation of 18 U.S.C. § 2423(b).

Count 2

From on or about July 31, 2013, and continuing to on or about August 4, 2013, both dates being inclusive, the defendant, **BENTLEY A. STREETT**, did travel in interstate commerce from Albuquerque, New Mexico, Bernalillo County, District of New Mexico, to Sycamore, Illinois for the purpose of engaging in any illicit sexual conduct with another person, namely, a sexual act (as defined in Title 18, United States Code, Section 2246) with JANE DOE 1, a person under 18 years of age that would be in violation of Chapter 109A of Title 18, United States Code, had the sexual act occurred in the special maritime and territorial jurisdiction of the United States.

In violation of 18 U.S.C. § 2423(b).

Count 3

On or about September 15, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **BENTLEY A. STREETT**, did knowingly persuade, induce, entice and coerce a minor, and did knowingly attempt to persuade, induce, entice and coerce JANE DOE 2, a minor, that is, a person under 18 years of age, to engage in sexually explicit conduct for the purpose of producing a visual depiction of said conduct, having reason to know that such visual depiction was intended to be transported in interstate commerce, and was produced using materials that had been mailed, shipped, and transported in interstate commerce, and that such visual depiction was transported in interstate commerce.

In violation of 18 U.S.C. §§ 2251(a), (e), and 2256.

Count 4

On or about November 4, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **BENTLEY A. STREETT**, did knowingly persuade, induce, entice and coerce a minor, and did knowingly attempt to persuade, induce, entice and coerce JANE DOE 3, a minor, that is, a person under 18 years of age, to engage in sexually explicit conduct for the purpose of producing a visual depiction of said conduct, having reason to know that such visual depiction was intended to be transported in interstate commerce, and was produced using materials that had been mailed, shipped, and transported in interstate commerce, and that such visual depiction was transported in interstate commerce.

In violation of 18 U.S.C. §§ 2251(a), (e), and 2256.

Count 5

On or about November 9, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **BENTLEY A. STREETT**, did knowingly persuade, induce, entice and coerce a minor, and did knowingly attempt to persuade, induce, entice and coerce JANE DOE 3, a minor, that is, a person under 18 years of age, to engage in sexually explicit conduct for the purpose of producing a visual depiction of said conduct, having reason to know that such visual depiction was intended to be transported in interstate commerce, and was produced using materials that had been mailed, shipped, and transported in interstate commerce, and that such visual depiction was transported in interstate commerce.

In violation of 18 U.S.C. §§ 2251(a), (e), and 2256.

Count 6

On or about December 4, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **BENTLEY A. STREETT**, did knowingly persuade, induce, entice and coerce a minor, and did knowingly attempt to persuade, induce, entice and coerce JANE DOE 2, a minor, that is, a person under 18 years of age, to engage in sexually explicit conduct for the purpose of producing a visual depiction of said conduct, having reason to know that such visual depiction was intended to be transported in interstate commerce, and was produced using materials that had been mailed, shipped, and transported in interstate commerce, and that such visual depiction was transported in interstate commerce.

In violation of 18 U.S.C. §§ 2251(a), (e), and 2256.

Count 7

On or about July 31, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **BENTLEY A. STREETT**, did knowingly use the mail and any means and facility of interstate commerce to transfer obscene matter, and did knowingly transfer obscene matter to JANE DOE 1, an individual less than 16 years of age, and the materials in question are obscene matter, and did know at the time of the transfer the general nature of the contents of the matter.

In violation of 18 U.S.C. § 1470.

Count 8

On or about November 30, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **BENTLEY A. STREETT**, did knowingly use the mail and any means and facility of interstate commerce to transfer obscene matter, and did knowingly transfer obscene matter to JANE DOE 3, an individual less than 16 years of age, and the materials in question are obscene matter, and did know at the time of the transfer the general nature of the contents of the matter.

In violation of 18 U.S.C. § 1470.

Count 9

On or about January 20, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **BENTLEY A. STREETT**, did knowingly use the mail and any means and facility of interstate commerce to transfer obscene matter, and did knowingly transfer obscene matter to JANE DOE 3, an individual less than 16 years of age, and the materials in question are obscene matter, and did know at the time of the transfer the general nature of the contents of the matter.

In violation of 18 U.S.C. § 1470.

FORFEITURE ALLEGATIONS

Upon conviction of any offense alleged in this Indictment, Defendant **BENTLEY A. STREETT** shall forfeit to the United States pursuant to 18 U.S.C. §§ 2251(a) and 2253:

- A. Yellow Nokia Lumia 920 cellular telephone;
- B. Black Samsung SGH-T159 cellular telephone; and
- C. Macintosh Mac Book Pro laptop, S/N 730197WDATM

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

ssistant United States Attorney

2/20/15 t:58PM